

**IN THE UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA)
Plaintiff,)
v.)
Six Hundred Ninety Five Dollars (\$695.00) in)
U.S. Currency, more or less, seized from Phat)
Stuff, Keene, New Hampshire; et al,)
Defendants *in rem*)
Case No. 14-294-PB

VERIFIED CLAIM OF FORD MOTOR CREDIT COMPANY

TO: PLAINTIFF AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Ford Motor Credit Company has an interest in the defendant *in rem* property, one 2011 Ford F250, Vin #1FT7W2B68BEA60933, registered to Panagiotes and Katie Eliopoulos.

1. On or about December 29, 2010, Panagiotis J Eliopoulos and Katie A Eliopoulos executed and delivered to Ford Motor Credit a Retail Installment Contract in the principal amount of \$35,258.50. A copy of the contract and Title are attached hereto as Exhibit A.
2. The contract gives Ford Motor Credit a secured interest in one 2011 Ford F250, Vin #1FT7W2B68BEA60933.
3. As of September 3, 2014, the principal and interest balance owing is \$16,535.31. Interest will continue to accrue under the contract at a rate of 6.9% per diem from September 3, 2014.

4. By virtue of Ford Motor Credit Company's interest in the defendant property, Ford Credit Company demands restitution and the right to defend this action.

Respectfully submitted,
Ford Motor Credit
By its attorneys,
Niederman, Stanzel & Lindsey, PLLC

Dated: September 4, 2014

By: /s/ Jay M Niederman
Jay M. Niederman, NH Bar #1874
55 West Webster Street
Manchester, NH 03104
603-668-5960
jay@nslnh.com

VERIFICATION

I, Wendy Smith, am the Team Leader, of Ford Motor Credit Company, and I am authorized to make this verification on its behalf. I have read the foregoing verified claim of Ford Motor Credit Company and know the contents thereof. I am informed and believe that the matters stated are true and on that basis I declare that the matters stated are true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 4, 2014

/s/ Wendy Smith
Wendy Smith

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served electronically via ECF upon the following:

Rob Rabuck, Esq. rob.rabuck@usdoj.gov
Charles Keefe, Esq. keefe@wbdklaw.com

Exhibit A

440742

THIS IS TO CERTIFY THAT THIS IS A TRUE AND EACH
TERMINAL SALES CONTRACT OF

CERTIFICATE OF TITLE

STATE OF NEW HAMPSHIRE

VEHICLE IDENTIFICATION NO.
1FT7W2B68BEA80033

TITLE NO.

MODEL YR. MPG YR. GVM
2011 6000AXLES: C2
2 3MAKE
FORDMODEL
F250BODY STYLE
PKUPODOMETER
100000

ACTUAL MILEAGE

NEW/USED: ISSUED DATE
NEW 01/20/2011PURCHASED DATE
12/28/2010

PREVIOUS TITLE & STATE

MAILING ADDRESS

FORD MOTOR CREDIT CO
PO BOX 105704
ATLANTA GA 303465704

THIS IS TO CERTIFY THAT THIS IS A TRUE AND EXACT

COPY OF THE ORIGINAL TITLE

BRAND/PERMIT INFORMATION
FORD MOTOR CREDIT COMPANYBY STATE DATE 01/03/14
SUBSCRIBED AND SWORN TO BEFORE ME THIS 03 DAY

OF JANUARY 2014

NOTARY

FIRST LIENHOLDER NAME AND ADDRESS

FORD MOTOR CREDIT CO
PO BOX 105704
ATLANTA GA 303465704

SECOND LIENHOLDER NAME AND ADDRESS

Elaine Murray
NOTARY PUBLIC
State of South Carolina
My Commission Expires
June 4, 2019

RELEASE OF LIEN

THE OWNER/HOLDER ON THE VEHICLE DESCRIBED IN THIS CERTIFICATE DOES HEREBY STATE THAT THE LIEN IS RELEASED.

BY _____ FIRM _____ SIGNATURE OF AUTHORIZED AGENT _____ DATE _____

BY _____ FIRM _____ SIGNATURE OF AUTHORIZED AGENT _____ DATE _____

THE DIVISION OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE APPLICANT HERIN NAMED IS DULY REGISTERED AS THE OWNER OF THE VEHICLE DESCRIBED ABOVE; AND THAT FROM THE STATEMENTS OF THE OWNER AND THE RECORDS ON FILE WITH THIS DIVISION, THE VEHICLE DESCRIBED IS SUBJECT TO THE LIENS ENUMERATED, IF ANY, AND NO OTHERS.

CONTROL NUMBER
D0118603RICHARD C. BAILEY, JR.
DIRECTOR

TDMY1 (REV 01/10)

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VOID IF ALTERED